

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

MATTHEW D. RING (01)

NO. 3:16-CR-0239-L

FACTUAL RESUME

Defendant, Matthew D. Ring, his attorney, John M. Nicholson, and the United States of America agree to the law and facts as follows:

ELEMENTS OF THE OFFENSES

Count One

Damaging Property of a Reproductive Health Services Facility
[Violation of 18 U.S.C. § 248(a)(3) and (b)(1)]

In order to prove the offense of Damaging Property of a Reproductive Health Services Facility, in violation of 18 U.S.C. § 248(a)(3) and (b)(1), as alleged in Count One of the Information, the government must prove each of the following elements beyond a reasonable doubt:

- First:* That the defendant intentionally damaged or destroyed the property of a facility; and
- Second:* That the defendant damaged or destroyed the property of such facility because it provides reproductive health services.

STIPULATED FACTS

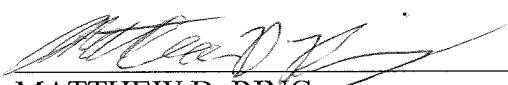
1. Ring admits that on or about August 29, 2015, in the Dallas Division of the Northern District of Texas, he intentionally damaged and destroyed, and attempted to damage and destroy, the property of a facility because such facility provides reproductive health services, to wit: by smashing a window at Planned Parenthood, a reproductive health services facility, as defined by 18 U.S.C. § 248(e), located at 5290 Beltline Road #134, Addison, Texas 75001, to delay and stop its client services, in violation of 18 U.S.C. § 248(a)(3) and (b)(1).
2. More specifically, Ring admits and agrees that in the early morning hours on August 29, 2015, he drove to the Planned Parenthood at 5290 Beltline Road #134, Addison, Texas 75001, with the intent to damage the facility, and did damage it. Once he arrived and parked nearby Planned Parenthood, he put on a surgical mask to try to disguise himself, took out a crowbar/tire iron-type instrument, and walked to the Planned Parenthood where he smashed a window. Ring further agrees and admits that he smashed the window to force Planned Parenthood to shut down temporarily and delay its client services because he believed abortions were being performed there. Ring also admits that after he damaged the window, he fled the location in his vehicle – a four-door Kia sedan. Ring acknowledges that he caused Planned Parenthood a loss of at least \$1251.
3. Ring further acknowledges that minutes after he smashed the window at Planned Parenthood and while he was driving his Kia sedan, he was pulled over by officers with

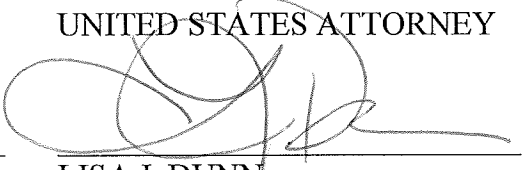
the Addison Police Department, identified, and questioned. Inside the car, officers found the surgical mask and the crowbar/tire iron-type tool in plain view. Ring agrees and admits that post-arrest, he was *Mirandized* and interviewed by detectives and FBI special agents during which he truthfully and voluntarily admitted that he intentionally damaged the Planned Parenthood because he believed abortions were being performed there.

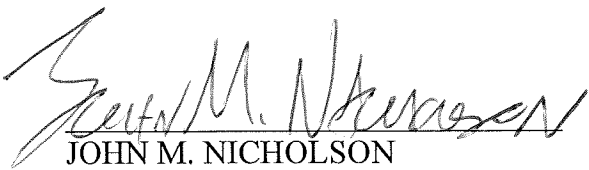
4. Ring acknowledges that Planned Parenthood is a reproductive health services facility, as defined by 18 U.S.C. § 248(e).

AGREED TO AND SIGNED on this 12th day of August, 2016.

JOHN R. PARKER
UNITED STATES ATTORNEY


MATTHEW D. RING
Defendant


LISA J. DUNN
Assistant United States Attorney
Oklahoma State Bar No. 16795
1100 Commerce Street, Third Floor
Dallas, Texas 75242
Telephone: 214-659-8600
Facsimile: 214-659-8809
Email: Lisa.Miller@usdoj.gov


JOHN M. NICHOLSON
Attorney for Defendant